

May 24, 2022

## BY ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: 2023 Last Resort Service Procurement Plan  
Docket No. \_\_\_\_\_**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I write to request that the Rhode Island Public Utilities Commission (“PUC”) approve the continuation of the Company’s approved 2021 Last Resort Service (“LRS”) Procurement Plan (“LRS Plan”) for its 2023 LRS Plan because the Company does not propose any changes.

As background, Rhode Island General Laws § 39-1-27.3(c) requires the Company to arrange for a last resort power supply for customers who are not otherwise receiving electric service from a Non-regulated Power Producer or through Standard Offer Service (“SOS”).<sup>2</sup> Pursuant to R.I. Gen. Laws § 39-1-27.3(c), the Company must file a supply procurement plan with the PUC that includes the procurement procedure, the pricing options being sought, and a proposed term of service for which LRS will be acquired. All components of the procurement plan are subject to the PUC’s review and approval. The 2021 LRS Plan, filed on October 11, 2019 and approved July 23, 2020, include all transactions executed in calendar years 2021 and 2022 which include delivery periods through 2024. Since the Company does not have any changes to the 2021 LRS Plan other than dates, the Company respectfully requests that the PUC approve its request to continue the 2021 LRS Plan. Please see Attachment A for a schedule of the transactions in calendar years 2023 and 2024 for the 2023 LRS Plan which include deliver periods through 2026.

In the 2021 LRS Plan, the Company used a laddered and layered repeating procurement schedule for the Residential and Commercial Groups. This type of procurement was first introduced in the 2011 SOS Plan (Docket No. 4149) and is the Company’s preferred procurement method because the transactions are at different times and are dollar-cost averaged to create a blended supply rate. The Company will continue to use Full Requirements Service contracts for energy and ancillary services market costs. The Company will also continue to procure 10% of the LRS obligation in the spot market. In Order No. 23366, the PUC supported

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (“National Grid” or “Company”).

<sup>2</sup> Rhode Island General Laws § 39-1-27.3(b). The Company’s requirement to arrange power supply for customers through SOS concluded at the end of 2020.

Luly E. Massaro, Commission Clerk  
2023 Last Resort Service Procurement Plan  
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the continuation of a dollar cost averaging approach because it “protects customers from extremes in short-term volatility.” Order No. 23366 at p. 7.

At an Open Meeting on March 29, 2022, the PUC stated that it would request the Company to compare the value of distributed generation (“DG”) resources that currently participate in the wholesale market to the value of the DG resources if they did not participate in the wholesale market. The results of this comparison would not affect the quarterly solicitations or type of transactions that the Company proposes in the 2023 LRS Plan. Additionally, the results of the comparison would impact procurement for all customers, including those with electric service from Non-regulated Power Producers, and not just the subset of customers obtaining electric service through LRS. The value of DG resources study will impact various rate mechanisms including the Renewable Energy Growth Program, net metering, transmission, Long Term Contracting, in addition to the procurement of electric service for LRS and from Non-regulated Power Producers. For these reasons, the Company does not include the results of this comparison in the 2023 LRS Plan because it would be more appropriate to address it separately in a broader context. Upon receipt of the PUC’s request, the Company will begin its analysis of the impact of DG resources to all of these rate mechanisms.

In conclusion, for the 2023 LRS Plan, the Company proposes to continue the 2021 LRS Plan with no changes. The 2023 LRS Plan will meet the Company’s goals by continuing its preferred laddered and layered procurement schedule which balances rate stability and market price signals.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,



Andrew S. Marcaccio

Enclosure

cc: Docket 4978 Service List  
Christy Hetherington, Esq.  
John Bell, Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

\_\_\_\_\_  
Joanne M. Scanlon

May 24, 2022

Date

**Docket No. 4978 - National Grid – 2021 Last Resort Service Procurement Plan**  
**Service List updated 1/20/2022**

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**THE NARRAGANSETT ELECTRIC COMPANY**  
**d/b/a NATIONAL GRID**  
**RIPUC DOCKET NO. \_\_\_\_\_**  
**2023 LAST RESORT SERVICE PROCUREMENT PLAN**  
**ATTACHMENT A**

**Residential Solicitations**

	Apr-2023	May-2023	Jun-2023	Jul-2023	Aug-2023	Sep-2023	Oct-2023	Nov-2023	Dec-2023	Jan-2024	Feb-2024	Mar-2024	Apr-2024	May-2024	Jun-2024	Jul-2024	Aug-2024	Sep-2024	Oct-2024	Nov-2024	Dec-2024	Jan-2025	Feb-2025	Mar-2025	Apr-2025	May-2025	Jun-2025	Jul-2025	Aug-2025	Sep-2025	Oct-2025	Nov-2025	Dec-2025	Jan-2026	Feb-2026	Mar-2026			
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**NOTE:**  
Approved Full Requirement Service (FRS) solicitations are shown in white - 2021 LRS Plan.  
Requested FRS solicitations are shown in green - 2023 LRS Plan.  
Solicitation shaded in gray will be requested in a future LRS Plan.

**Commercial Solicitations**

	Apr-2023	May-2023	Jun-2023	Jul-2023	Aug-2023	Sep-2023	Oct-2023	Nov-2023	Dec-2023	Jan-2024	Feb-2024	Mar-2024	Apr-2024	May-2024	Jun-2024	Jul-2024	Aug-2024	Sep-2024	Oct-2024	Nov-2024	Dec-2024	Jan-2025	Feb-2025	Mar-2025	Apr-2025	May-2025	Jun-2025	Jul-2025	Aug-2025	Sep-2025	Oct-2025	Nov-2025	Dec-2025	Jan-2026	Feb-2026	Mar-2026				
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**Industrial Solicitations**

	Jan-2023	Feb-2023	Mar-2023	Apr-2023	May-2023	Jun-2023	Jul-2023	Aug-2023	Sep-2023	Oct-2023	Nov-2023	Dec-2023	Jan-2024	Feb-2024	Mar-2024	Apr-2024	May-2024	Jun-2024	Jul-2024	Aug-2024	Sep-2024	Oct-2024	Nov-2024	Dec-2024	Jan-2025	Feb-2025	Mar-2025	Apr-2025	May-2025	Jun-2025										
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On-Going Spot Market Purchases	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		

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Joanne M. Scanlon

May 24, 2022

Date

**Docket No. 4978 - National Grid – 2021 Last Resort Service Procurement Plan**  
**Service List updated 1/20/2022**

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